STATE OF UTAH
NATURAL RESOURCES & ENERGY
Oil, Gas & Mining

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Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Cleon B. Feight, Division Director

May 3, 1982

Mr. Marvin L. Berg, P. E.
Quarry Superintendent
Martin Marietta Cement
P. O. Box 51
Nephi, Utah 84648

RE: Martin Marietta Cement
Limestone Quarry
April 15, 1982, Facilties
Field Tour
ACT/023/004
Juab County, Utan

Dear Mr. Berg:

Thank you for your tour of the Martin Marietta Cement Plant and Quarry facilty. The tour was very informative and enjoyable. In the course of the tour, a few questions arose. The intent of this letter is to seek clarification on sucn area viewed during the tour.

The first such questions involves topsoil storage and protection. Upon review of the mine plan on return to the office, some questions are evident. The location of the soil storage is not shown on any map, nor is there an estimate as to volumes of soil that will be available, having been retrieved during site preparation, for final reclamation. Another question is the material that is at the pit south of the main access road (this is the pit which will be used for storm water runoff control upon implementation of Forest Service recommendations for the 50 year storm). What is the source of this material? During the inspection, it was indicated to Division representatives that this material resulted from plant construction. If so, why was it not stockpiled or is this considered to be a stockpile? If it is indeed considered to be a stockpiled, what procedures will be used to retrieve the material and how will it be protected prior to redistribution. Please submit a map showing all soil storage locations and estimated volume of these areas.

From looking at your soils information contained in Section G of your approved Mining and Reclamation Plan, sample sites #2, #3 and #4, the waste disposal area and manufacturing area, areas north and south of 132, respectively, there appears to be no significant differences in any of the parameters tested in the soil analysis. Therefore, the Division feels that any of the material would have been suitable for saving. The only contraints being lack of surficial materials or excessively rocky nature.

In your MRP, you indicate that 45 acres will be devoted to the purpose of manufacturing and raw material areas. In addition, 44 acres will be used for your waste disposal area. Apparently this is in addition to any of the old mined-out pits to be filled in. As indicated by these figures, approximately 90 acres of disturbance will result from this operation. Obviously, from soil characteristics provided in your mine plan, topsoil could be saved from all these areas. What is the expected depth of removal in these areas, and what is your estimated total volume? In addition, please provide plans for seeding all topsoil storage areas in fall and provide the Division with a list of species that would be utilized. Erosion on the topsoil stockpiles near the reclaim storage area has become evident. Although not excessive at this time, it bears close watching and efforts at revegetation or mulching to decrease this erosion would be well advised.

The operator commits in Section 8 of the MRP to remove all topsoil and store in a suitable place and to reseed the stockpile and provide erosion protection. Any erosion that becomes excessive in these areas will be in violation of Rule M-10(14) and the mine plan. In addition to Forest Service stipulations which indicate that the operator will comply with state regulations and Item #3 as advertised in the publication and various local newspapers.

Another concern came upon cursory review of the approved plan was the hydrologic concerns. An open ditch carries all runoff into the Sevier River. The operator states in Section J of the plan that no water has been seen in the ditch, although signs of erosion are present. It further states that the ditch probably will not carry water except in the event of a 100- or 1,000-year storm. In the next section entitled "Climatological Data," the operator indicates that approximately 16 inches of rainfall occurs in the area. In other words, it is very similar to Salt Lake City annual rainfall. The operator in this section states that a one and one-half inch rain storm would be expected for a duration of 30-45 minutes, once in every 10-20 years. Please clarify this apparent disagreement. Since the estimated duration of mining activities is 40 years, it appears likely that fairly substantial flow may be expected to occur in this time frame. In order to refute the climatological data, please either find better data locally, or come up with a

method to test for this on on-site conditions. It may be to everyone's advantage to consider some sort of sediment control in the ditch. This could be in the form of check dams of straw bale dikes. In the event the operator does not feel implementing sediment control structures is appropriate, he may wish to set up a sampling program to demonstrate that suspended solids contributions to the Sevier River is not in excess of state regulations.

If you have any questions, please feel free to call.

Sincerely,

Thomas L. Portle

THOMAS L. PORTLE
RECLAMATION SOILS SPECIALIST

cc: Jim Smith, DOGM

TLP/btb